

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-CR-20165-RUIZ

UNITED STATES OF AMERICA

v.

AMANDA RODEN,

Defendant.

FACTUAL PROFFER

The United States of America, the defendant Amanda Roden (the “defendant”), and the defendant’s undersigned counsel (collectively, the “Parties”), agree that had this case proceeded to trial, the United States would have proven the following facts, among others, beyond a reasonable doubt:

On or about October 9, 2023, the defendant and her co-conspirator—Ronald Zapete—went together to a Dania Beach firearms store to purchase firearms. Zapete was not legally allowed to purchase firearms due to his immigration status as a citizen of the Dominican Republic in the United States on advanced parole. Accordingly, the defendant bought three firearms. She signed an ATF Form 4473 affirming that the firearms were for her use and that she was not purchasing the firearms for anyone else. Had she not made this affirmation, the store would not have sold her the firearms.

On or about October 17, 2023, Zapete placed an order by telephone with a freight forwarder (“Company 1”) to (1) pick up a parcel from an address in North Miami—an address at which both he and the defendant resided—and (2) to deliver that parcel to an address in the Dominican Republic.

Between October 17, 2023, and October 20, 2023, the defendant and Zapete put one (1) Smith & Wesson MP 380mm pistol, serial number KCD3575; one (1) Glock 19 Gen 5 9mm pistol, serial number CAGZ168, one (1) FN 5.7 pistol, serial number 386465977; and 886 9mm caliber rounds, 30 380mm caliber rounds, and 13 pistol magazine cartridges in the parcel. The defendant and Zapete hid the firearms and ammunition inside a black bag and underneath bags of rice and other household goods. The defendant had purchased two of the three firearms—the Glock and the FN 5.7—on or about October 9, 2023 at the Dania Beach firearms store. The defendant previously purchased the Smith and Wesson at a gun show. The three pistols are “firearms” as defined in Title 18, United States Code, Section 921(a)(3).

On or about October 20, 2023, a Company 1 truck went to that same address in North Miami, in the Southern District of Florida, and accepted the parcel from Zapete. Neither the defendant, Zapete, nor the listed recipient of the parcel are a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms, and neither declared to attempted to declare that the parcel contained firearms.

Between October 20, 2023 and October 31, 2023, Company 1 transported the parcel from Miami, Florida, in the Southern District of Florida, to Rio Haina in the Dominican Republic. On or about October 31, 2023, officials in the Dominican Republic inspected the parcel and found the firearms, ammunition, and magazine slides inside.

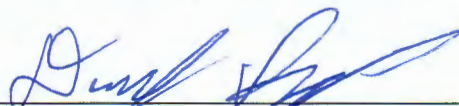
[REMAINDER INTENTIONALLY LEFT BLANK]

The facts described above are not intended to be a complete recitation of the facts of this case and are merely intended to form a basis for the undersigned Defendant's knowing, willful, and intentional plea of guilty, and the parties agree are sufficient to prove a violation of Count 2 of the Indictment beyond a reasonable doubt.

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

Date: 6/26/2024

By:


DANIEL ROSENFELD
ASSISTANT UNITED STATES ATTORNEY

Date: 06/17/24


JEFF WEINER
ATTORNEY FOR DEFENDANT

Date: 6/17/24


AMANDA RODEN
DEFENDANT